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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Mag. No. 20-12390  
:   
v. : Hon. James B. Clark, III  
:   
LUIS EDUARDO GARCIA : **CRIMINAL COMPLAINT**

I, Special Agent Jeremy Rodriguez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Drug Enforcement Administration, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof:

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Jeremy Rodriguez  
Special Agent  
Drug Enforcement Administration

Agent Rodriguez attested to this Complaint by telephone pursuant to FRCP 4.1(b)(2)(A), on September 5, 2020 in the District of New Jersey

HONORABLE JAMES B. CLARK, III  
UNITED STATES MAGISTRATE JUDGE



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Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

*(Conspiracy to Distribute Heroin)*

Between on or about September 4, 2020, and on or about September 5, 2020, in Somerset County, in the District of New Jersey, and elsewhere, defendant,

LUIS EDUARDO GARCIA,

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

**ATTACHMENT B**

I, Jeremy Rodriguez, am a Special Agent with the United States Drug Enforcement Administration ("DEA"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement is investigating a drug trafficking and money laundering organization ("DTO/MLO") that sources kilogram quantities from Texas and elsewhere, and distributes those narcotics in New Jersey, New York, and elsewhere. During the investigation, law enforcement has learned that LUIS EDUARDO GARCIA ("GARCIA") assists the DTO/MLO in coordinating large shipments of narcotics from Texas to New Jersey, New York, and elsewhere.

2. Specifically, on or about September 4, 2020, law enforcement conducted a lawful vehicle stop on GARCIA. Upon questioning GARCIA, law enforcement obtained consent to search GARCIA's vehicle, and recovered approximately 2 kilograms of a mixture and substance that field tested positive for the presence of heroin in the trunk of the vehicle. As a result, law enforcement arrested GARCIA. After being advised of his Miranda rights, GARCIA admitted that he knew there were narcotics in his car.